

March 08, 2017

Secretary Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC 20554

Subject: Comments on Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies (WT Docket No. 16-421)

Dear Secretary Dortch:

Johnstown is a village in Licking County, Ohio, United States. The population was 4,632 at the 2010 census.

This letter is our response to the Federal Communications Commissions' invitation to submit comments regarding streamlining deployment of small cell infrastructure by improving wireless facilities siting policies. As you determine how local land-use regulations or actions affect wireless infrastructure deployment, we offer the following comments in the three categories laid out in the public notice: Local Governments' Practices that "Prohibit or Have the Effect of Prohibiting" Provision of Service; Reasonable Period of Time for Review of Siting Applications; and Application Process Fees and Charges for Use of Rights-of-Way.

We desire and recognize the need to accommodate better wireless internet communication to meet the demand of consumers, meet the needs of safety services and further our efforts in economic development. We have a codified process for addressing installation of small cell wireless technology in the public right-of-way. This holds us accountable to the wireless companies and helps them by clarifying our processes so they can better know what to expect from us when applying to install small cell technology within our boundaries.

#### **1. Local Governments' Practices that "Prohibit or Have the Effect of Prohibiting" Provision of Service**

We believe the coverage that the companies provide should be ubiquitous, providing complete coverage throughout communities, rather than support the potential 'redlining' wireless coverage based on demographics or economic characteristics. It is our desire to work with the wireless carriers and be proactive in identifying appropriate siting of small cell technology installations to ensure this complete, nondiscriminatory coverage. If everyone has a fair opportunity to take advantage of such technologies, we believe they can be of great economic benefit and transform our community.

We also have the responsibility to protect our capital investments and fulfill government's responsibility of ensuring the health, safety, welfare and aesthetic qualities in our communities. We do not have a robust asset inventory that details whether public infrastructure can support additional weight, wind load or other impacts that could have catastrophic results to public property. We may need assistance from the companies to make this determination.

## **2. Reasonable Period of Time for Review of Siting Applications**

We usually process 1 wireless permits per year, and dedicate approximately 1/2 fte to the process. With the expected increase as noted, we would expect either the need to increase personnel to maintain or reduce the siting review period, or redirect existing personnel from other permitting functions such as building permits, and thereby adversely affect economic development. We do not have a history of giving preferential treatment to any particular wireless company.

## **3. Application Processing Fees and Charges for Use of Rights-of-Way**

We appreciate the desire to establish a consistent and well defined fee structure so companies can plan expenses. However, this should not be mandated at a national level, as each state and community within have varying wages which affect processing costs. Under our state code, we can only charge for actual and direct costs.

Thank you for the opportunity to comment on how small cell infrastructure affects our community. We look forward to continuing our efforts of advancing the deployment of new and emerging communications technologies in the best possible manner.

Sincerely,



Eric Sandine  
Community Development Specialist  
GGC Engineers  
Contract Engineers for the Village of Johnstown